From:	McCarter, Jennifer
To:	Jacobson, Linda
Cc:	Bailley, Treasure
Subject:	Comanche groundwater monitoring data request
Date:	Wednesday, February 12, 2020 11:07:38 AM
Attachments:	J78127-1 UDS Level 2 Report Rev(1) Final Report.pdf J78157-1 UDS Level 2 Report Final Report.pdf J78157-2 UDS Level 2 Report Final Report.pdf

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Linda,

In response to your request, attached is the first batch (2015 Q4) of lab reports for the 9 groundwater samples (8 background +1) that were taken from the Certified Groundwater Monitoring System at the Comanche Station CCR Landfill and Bottom Ash Pond (BAP) prior to October 17, 2017. Due to file size, I'm sending in multiple emails. I will also send a spreadsheet of all the data, which I think is more helpful than the individual lab EDDs, but please let me know if you would like those also.

Concurrently with implementation of the CCR groundwater monitoring program, HDR conducted a review and evaluation of multiple previous site hydrogeologic investigations. Based on this review, and observations made during drilling of the new CCR wells and background sampling, HDR concluded that the shallow groundwater present in the colluvium and upper weathered bedrock at the site is localized, laterally discontinuous, and represents perched water from surface infiltration, not an aquifer. The uppermost aquifer at the site is in the Dakota Sandstone beneath approximately 1,500' of low permeability Pierre Shale, which has no reasonable probability of adverse impacts from the CCR units at Comanche. These conclusions were consistent with results of past evaluations and were documented in the Comanche Station No Aquifer Determination, which we understand EPA has reviewed. Subsequent to this no aquifer technical determination and using our best professional judgement under the self-implementing structure of the CCR Rule (Colorado has not and we understand does not intend to develop a state CCR program), we modified the CCR groundwater monitoring program at Comanche to continue semi-annual water level measurements to monitor for any changes that may alter this determination. However, since the water does not represent a groundwater aquifer, and the data we have indicates the pond water quality is better than the perched water quality, we suspended sampling. This decision as it relates to the bottom ash pond is consistent with classification of this pond as Type A by the Colorado Department of Environmental Health and Environment, Hazardous Materials and Waste Management Division pursuant to 6 CCR-1007-2 Part 1, Section 9 (Waste Impoundments), based upon the depth to groundwater.

We believe that the data continues to support that the Comanche BAP poses no reasonable probability of adverse effects on health or the environment. Xcel Energy recently commented on EPA's proposed rule for unlined impoundments *(A Holistic Approach to Closure Part A)* urging EPA to provide an alternative that allows continued operation of ponds such as the Comanche BAP, which presents virtually no risk and is slated to close by a date certain. For the Comanche BAP, we would seek continued operation through 2025, at which time the coal units that utilize this pond will be retired, as approved by the Colorado Public Utilities Commission. In anticipation of EPA's final Federal CCR Permit Program and related rules, we would like to begin discussing with EPA the very unique site specific hydrogeologic conditions at Comanche Station as they relate to the CCR Rule, discuss possible options to address the Comanche BAP, and address any questions EPA may have.

Thank you for your consideration, and I look forward to hearing from you.

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